

FILED

12:26 pm Oct 25 2017

Clerk U.S. District Court
Northern District of Ohio
Toledo

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Matthew Seifert, a Law Enforcement Agent with the United States Customs and Border Protection, United States Border Patrol, hereinafter referred to as your Affiant, being duly sworn, deposes and states:

INTRODUCTION

1. Affiant makes this affidavit in support of a criminal complaint and arrest warrant. This affidavit is made based on my own personal knowledge and derived from credible law enforcement sources. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.
2. Based on the information set forth below, your Affiant believes Eliazar LOPEZ-BRAVO is a national and citizen of Mexico, is an alien illegally present in the United States, and has violated the following federal criminal laws: Title 18, United States Code, 1028(a)(3) (possession with intent to transfer unlawfully five or more identification documents or false identification documents).

TRAINING AND EXPERIENCE

3. Affiant has been a law enforcement agent of the Department of Homeland Security, United States Customs and Border Protection, United States Border Patrol since March of 2010. Affiant has over seven (7) years of specialized law enforcement training and experience to include, but not limited to, the detection and apprehension of undocumented foreign nationals, the detection and investigation of the sale/use of fraudulent documents and the apprehension of fraudulent document users (imposters), and the detection and interdiction of narcotics and human smugglers/traffickers and other criminal individuals. Affiant has been trained in the laws of search and seizure at the United States Border Patrol Academy in Artesia, New Mexico and has received subsequent training in the utilization, preparation, and execution of search and seizure warrants as a member of a multi-jurisdictional narcotics taskforce.
4. Affiant has approximately two (2) years of experience investigating the manufacturing, distribution, and use of controlled substances while being a member of a multi-jurisdictional narcotics taskforce known as the Upper Peninsula Substance Enforcement Team (UPSET) and has participated in approximately 200 controlled substance investigations. Affiant has utilized

informants and undercover officers to conduct the controlled purchases of controlled substances, conducted or participated in surveillance, conducted interviews of both witnesses and suspects, executed felony arrests, and drafted and executed search warrants and other court orders, which resulted in the seizure of dangerous drugs, and the records, books, and proceeds derived from illicit activity.

5. Affiant has approximately one (1) year experience as a member of the Field Intelligence Unit at the Sandusky Bay Border Patrol Station in Port Clinton, Ohio, with the purpose of conducting intelligence driven operations/investigations. Affiant has interviewed, witnessed the interview of, and participated in the debriefing of numerous illegal aliens that have claimed they have purchased fraudulently obtained, altered, or counterfeit documents. Through this experience, your affiant has in depth knowledge concerning the trade of fraudulent documents. Affiant has investigated both criminal and administrative violations of law pertaining to immigration, controlled substances, and identity theft.
6. Affiant is currently assigned to the Detroit Sector Intelligence Unit (SIU) as a U.S. Border Patrol Intelligence Agent (BPA (I)) with the purpose of collecting, analyzing, and disseminating current intelligence information through the production of intelligence products, and conducting/supporting intelligence driven and targeted enforcement operations/investigations.

PROBABLE CAUSE

7. On July 20, 2017, a criminal investigation resulted in the execution of a federal search warrant at 121 Keefer Court, Willard, OH and a federal arrest warrant for Manuel GRANADOS. The search and arrest warrants were executed during a joint operation between members of the Detroit Sector Intelligence Unit (SIU), the Sandusky Bay Field Intelligence Unit (FIU), and the Detroit Sector Tactical Unit (BORTAC).
8. On July 20, 2017, during the execution of the search warrant at 121 Keefer Court listed in paragraph 7, agents seized approximately 11 fraudulent social security cards, two state identification cards, and three Lawfully Admitted Permanent Resident cards.
9. On July 20, 2017, during the execution of the search warrant at 121 Keefer Court listed in paragraph 7, agents seized a black Samsung Galaxy Grand Prime touchscreen smartphone. This cellular phone will hereinafter be referred to as PHONE 1.
10. On August 1, 2017, a search warrant was obtained to extract the data contained on PHONE 1. Two forensic data extractions were performed on PHONE 1; one by

Detective James Dec from the Toledo Police Department and the second by Border Patrol Intelligence Agent (BPA (I)) Mark Kutrip.

11. Analysis of the forensic data extractions listed in paragraph 10 revealed the following identifiable information of PHONE 1:
 - a. Manufacturer: Samsung
Model: SM-S920L
MEID: 256691547407734309 (HEX: 99000592760425)
ICCID: 89148000002536962423
MSISDN: 5672246374
12. Through the investigation into Manuel GRANADOS, the primary cellular phone number, or MSISDN, associated with Manuel GRANADOS was identified as (567) 224-6374. This is the same MSISDN that was connected to PHONE 1.
13. Forensic analysis of the data extracted from PHONE 1 indicated that GRANADOS, using PHONE 1, purchased, or otherwise obtained, false or stolen identity documents from other individuals. The analysis of PHONE 1 revealed approximately 76 identity document transactions between PHONE 1 and individuals using phone numbers (281) 409-2751 and (419) 217-6879. Agents identified the identity document transactions through analysis of text and multimedia messages sent between PHONE 1 exchanged with the users of the phone numbers (281) 409-2751 and (419) 217-6879.
14. The 76 identity document transactions include requests from GRANADOS for state identification cards, social security cards, Lawfully Admitted Permanent Resident (LAPR) cards. The majority of the transactions include photographs of Hispanic males and females taken against stark white backgrounds. Your affiant believes these photographs to be photographs of the end users of the requested false identity documents. Through your affiant's previous training and experience, including education and professional experience as graphic designer, your affiant recognizes this technique as a common technique used when the end goal is to digitally remove a person or an object from the background of a photograph or digitally insert a person into a photograph.
15. Analysis of the forensic data extractions listed in paragraph 10 revealed that 52 of the 76 identity document transactions occurred between PHONE 1 and phone number (281) 409-2751. This phone number was saved in PHONE 1 as contact "CD Marion." An investigation conducted on this phone number lead your affiant to believe that the user is Martha BUENDIA-CHAVARRIA.
16. Analysis of the forensic data extractions listed in paragraph 10 revealed that 24 of the 76 identity document transactions occurred between PHONE 1 and phone number (419) 217-6879. This phone number was saved in PHONE 1 as contact "CDs Michael." An investigation conducted on this phone number lead your

affiant to believe that the user is Eliazar LOPEZ-BRAVO. The following are examples of instances in which the user of phone number (419) 217-6879 transferred without lawful authority:

- a. Between August 22, 2016 and August 24, 2016, Eliazar LOPEZ-BRAVO received what was believed to be an order for a false Texas state identification document and a false social security card. The user of PHONE 1 sent a series of text messages to (419) 217-6879. In the exchange, PHONE 1 provided a name and date of birth, and requested “Azul con id.de Texas” (translated to “Blue with Texas ID”). “Blue” is believed to be a reference to social security cards, which are blue. PHONE 1 also provided photographs of a male, who is believed to be the end-user of the identification documents, at the request of the user of (419) 217-6879. The combination of a social security card and state ID was a frequent transaction between PHONE 1 and (419) 217-6879 (“CDs Michael”). The text message exchange also contained what appeared to be shipping information for the user of (419) 217-6879 to send the documents to GRANADOS under his alias R.P. and payment information.
- b. On December 28, 2016, Eliazar LOPEZ-BRAVO received what was believed to be an order for a false Michigan state identification document. The user of PHONE 1 sent a series of text messages to (419) 217-6879. In the exchange, PHONE 1 provided a name and date of birth, and requested a “carton con Michigan” (translated to “card with Michigan”), which is believed to be a reference to a Michigan ID card. PHONE 1 also sent a photograph of a female who is believed to be the end user of the identification document.
- c. On January 15, 2017, Eliazar LOPEZ-BRAVO received what was believed to be an order for a false Michigan state identification document. The user of PHONE 1 sent a text message to (419) 217-6879. In the exchange, PHONE 1 provided a name, date of birth, social security number and photograph of a male. The message also appeared to request a “cartón con Michigan” (translated to “card with Michigan”), which is believed to be a reference to a Michigan ID card.
- d. The analysis of PHONE 1 revealed an additional 21 apparent transactions involving requests for state identification cards, social security cards, or Lawfully Admitted Permanent Resident cards.

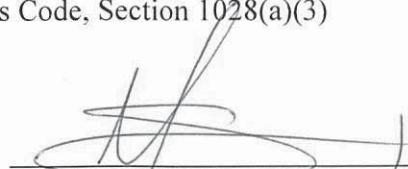
17. Open Source Intelligence (OSINT) revealed the last registered owner of phone number (419) 217-6879 to be Eliasar LOPEZ-BRAVO of Marion and Boughtonville, OH.

18. OSINT revealed LOPEZ-BRAVO to have a current address of 752 North Main Street in Marion, OH.

19. Law enforcement databases revealed Eliazar LOPEZ-BRAVO (DOB: 02/24/1969; County of Citizenship: Mexico; Alien File ("A-File") Number: 073737955 to be a citizen and national of Mexico by virtue of birth on February 24, 1969 in Chiapas, Mexico. He has no claim to United States Citizenship.
20. LOPEZ-BRAVO was previously arrested for administrative immigration violations. On August 9, 2011, ICE/ERO-Cleveland arrested LOPEZ-BRAVO during fugitive operations. LOPEZ-BRAVO was found to be a deportable alien under a previous order of removal by an immigration judge, dated 06/13/1995. The immigration judge issued the order in abstentia.
21. During the arrest listed in paragraph 20, LOPEZ-BRAVO was using the alias "Michael RIVERS" and initially claimed to be United States citizen.
22. Information received from ICE/ERO – Cleveland confirmed that LOPEZ-BRAVO is amenable to removal from the United States and has a current Order of Supervision (OSUP).
23. On August 14, 2017, your affiant received from ICE/ERO-Cleveland the current address and phone number information for LOPEZ-BRAVO. This information revealed a current address of 752 North Main Street, Marion, OH with a current cellular number of (419) 217-6879. This is the same number listed in paragraph 16 for PHONE 1 contact of "CDs Michael," and the same number that appeared to transfer false identity documents to GRANADOS.
24. On August 15, 2017, Eliazar LOPEZ-BRAVO reported to the ICE/ERO-Cleveland office and was affixed with a GPS location monitor under the OSUP listed in paragraph 22.
25. On August 09, 2017, your affiant provided information to Homeland Security Investigations (HSI) Special Agent (SA) Vincent Fazio regarding phone number (281) 409-2751. SA Fazio issued a subpoena for subscriber information and phone tolls for (419) 217-6879. Subpoena information revealed the subscriber for phone number (419) 217-6879 to be Eliasar LOPEZ-BRAVO at 319 Maple Street, Willard, OH.
26. Law enforcement databases and OSINT revealed 319 Maple Street, Willard, OH to be a previous address for LOPEZ-BRAVO.
27. Subpoena information also revealed that from May 2017 to August 2017 phone number (419) 217-6879 sent 226 picture/video messages that contained 677 attachments to phone number (281) 409-2751. This information indicates similar message activity to the activity identified during analysis GRANADOS' cellular phone as described in paragraph 13.

28. Certified Ohio Bureau of Motor Vehicles records list a phone number for LOPEZ-BRAVO as (419) 217-6879.
29. Based upon the above information Eliazar LOPEZ-BRAVO is believed to be the user of phone number (419) 217-6879 and the individual who was involved in the possession with intent to transfer five or more identification documents or false identification documents as described in paragraphs 13, 14, and 16.
30. On August 11, 2017 your affiant and Supervisory Border Patrol Agent William Stack conducted a custodial interview of a recently apprehended undocumented alien (UDA) at the Sandusky Bay Border Patrol Station. During the interview, the UDA advised of two document vendors operating in the Willard, OH area. Your affiant and SBPA Stack conducted two photographic lineups comprised of six photographs each. The UDA identified Manuel GRANADOS, known to the UDA as R.P., and Eliazar LOPEZ-BRAVO, known to the UDA as "Michael," as document vendors operating in the Willard, OH area.
31. During the interview in paragraph 30, the UDA advised LOPEZ-BRAVO manufactures identity documents at his residence along with his wife. The UDA continued to advise that the UDA believed LOPEZ-BRAVO had a machine to manufacture documents at his residence. The UDA advised the UDA purchased a false Lawfully Admitted Permanent Resident Card (LAPR) from LOPEZ-BRAVO for \$100 USD.
32. During the interview in paragraph 30, the UDA advised that GRANADOS would take orders from illegal aliens for false identity documents and would travel to Marion, OH to receive the false identity documents once he had three or more document orders. The UDA continued to advise GRANADOS would sometimes travel to Marion, OH twice in one day to pick up false identity documents. The UDA advised that GRANADOS would make arrangements for the transfer of false identity documents in the UDA's presence.
33. Based upon the above information, there is probable cause that Eliazar LOPEZ-BRAVO has violated the following federal criminal laws:

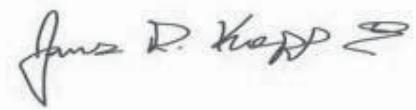
- a. Title 18, United States Code, Section 1028(a)(3)



Matthew Seifert, Border Patrol Intelligence Agent
United States Customs and Border Protection
Department of Homeland Security

Oct 25, 2017

Sworn to via telephone after
submission by reliable electronic
means. Crim. Rules. 4.1; 41(d)(3)



James R. Knepp, II
United States Magistrate Judge